

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

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IN RE: NEW ENGLAND COMPOUNDING) MDL No. 2419
PHARMACY, INC. PRODUCTS LIABILITY)
LITIGATION) Master Dkt. No. 1:13-md-2419- RWZ
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This Document Relates To:
All Cases
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**ASSENTED-TO MOTION FOR EXTENSION OF TIME FOR DEFENDANT UNIFIRST
CORPORATION TO RESPOND TO PLAINTIFFS' STEERING COMMITTEE'S
MOTION FOR ENTRY OF DEPOSITION AND ESI PROTOCOLS**

Defendant UniFirst Corporation (“UniFirst”) hereby moves, with the assent of the Plaintiffs’ Steering Committee (“PSC”), for an extension of time until February 28, 2014 to respond to the PSC’s Motion for Entry of Deposition and ESI Protocols (the “PSC’s Deposition and ESI Motion”). (Dkt. # 876).

In support of this motion, UniFirst states as follows:

1. UniFirst and the PSC have been continuing to meet and confer regarding the issues raised in the Motion, and the parties have a planned conference for today, February 25, 2014, to discuss deposition and ESI protocols.

2. On February 24, 2014, the Saint Thomas Entities filed a motion to extend their deadline to respond to the PSC’s Deposition and ESI Motion to February 28, 2014. (Dkt. # 947).

3. This brief extension will help UniFirst tailor its response to the issues that are still in dispute, following the meet and confer process.

4. Accordingly, UniFirst requests a brief extension, until February 28, 2014, to submit any papers in response to the Deposition and ESI Motion. The parties do not believe that this extension will result in any undue delay.

5. Counsel for the parties have conferred and the PSC assents to the requested extension.

WHEREFORE, UniFirst respectfully requests, with the assent of the PSC, that the Court grant its motion and enter an Order extending UniFirst's time to respond to the PSC's Deposition and ESI Motion until February 28, 2014.

Respectfully submitted,

DEFENDANT UNIFIRST CORPORATION

By its attorneys,

/s/ James C. Rehnquist

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Dated: February 25, 2014

**LOCAL RULE 7.1(A)(2) CERTIFICATION
AND CERTIFICATE OF SERVICE**

I, James C. Rehnquist, hereby certify that counsel for Defendant, UniFirst Corporation, conferred by e-mail with opposing counsel in an effort to resolve or narrow the issues presented in this motion prior to filing, and opposing counsel assents to the relief sought herein.

I further certify that a copy of this document, filed through the CM/ECF system will be accessible to those attorneys who are registered with the Court's electronic filing system and Notice of Electronic filing (NEF) will be sent to these parties by operation of the CM/ECF system on February 25, 2014.

/s/ James C. Rehnquist